

R. Hance Haney
Executive Director – Federal Regulatory

1020 19th Street NW, Suite 700
Washington, DC 20036

202 429 3125
202 293 0561 fax
Email hhane@qwest.com



August 20, 2002

Ex Parte

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W., TW-B204
Washington, D.C. 20554

Re: Application of Qwest Communications International, Inc.
To Provide In-Region InterLATA Services in the States of Colorado,
Idaho, Iowa, Nebraska and North Dakota, WC Docket No. 02-148

Application of Qwest Communications International, Inc.
To Provide In-Region InterLATA Services in the States of Montana,
Utah, Washington & Wyoming, WC Docket No. 02-189

Dear Ms. Dortch:

Qwest hereby responds to several questions from the Wireline Competition Bureau concerning number portability. The responses are attached.

The twenty-page limit does not apply as set forth in DA 02-1390 and DA 02-1666.

Sincerely,

A handwritten signature in cursive script that reads "Hance Haney".

cc: M. Carowitz
E. Yockus
G. Remondino
M. Cohen
R. Harsch
J. Jewel
P. Baker
C. Post
P. Fahn
B. Smith
J. Myles
J. Stanley

S. Vick
J. Orchard
C. Washburn
S. Oxley

QUESTION:

On June 24th, by voice mail, did Qwest request to assume the 406/294 NPA/NXX in advance of the LERG date of July 13, 2002? If so, at what time was the voice mail message sent?

RESPONSE:

OneEighty's Qwest Account Service Manager called OneEighty at 2:05 p.m. (MT) on June 24, 2002 to advise them that Qwest was beginning the activation of the returned code 406-294 and left a voicemail message to that effect. OneEighty left a voicemail message in response to the Account Manager after 5:00 p.m. (MT) on June 24th, after the Account Manager had left for the day. The Account Manager did not receive a page from OneEighty.¹ The Account Manager retrieved her voicemail messages at approximately 8:30 a.m. on June 25, 2002. The message by OneEighty was not marked urgent.

QUESTION:

If Qwest did request to assume the 406/294 NPA/NXX in advance of the July 13th LERG date, did it do so by any other means than by voice mail?

RESPONSE:

No, Qwest did not seek to contact OneEighty by any other means than voicemail. As explained in the initial ex parte on this matter, there would be no reason to contact the original code holder because they would have requested to disconnect and return the code and thus, should have no working telephone numbers.

There are no provisions in the guidelines requiring the new code holder to contact the original code holder unless the new code holder expects to activate the code later than the effective date and wants the original code holder to maintain some default routing until the new later effective date.²

QUESTION:

What are Qwest's procedures for assuming a NPA/NXX in advance of a LERG date?

RESPONSE:

The industry's Central Office Code Assignment Guidelines, Section 6.1.2, requires a 66 calendar day interval for NANPA to receive a request for a new code prior to effective date. This provides for a 21

¹ The Account Manager's pager number is included in the voicemail greeting. In addition, each CLEC is provided an escalation call list that includes contact names up to Vice Presidential level, telephone numbers, and pager information. Escalation information is also available on the Qwest Wholesale website at: <http://www.qwest.com/wholesale/clecs/exesclover.html>.

² The guidelines that NANPA follows can be found by accessing the FCC's North American Numbering Council's website at <http://www.fcc.gov/wcb/tapd/Nanc/> and then the link to the NANPA website (or directly to the NANPA website at www.nanpa.com/) for the Code Return procedures, § 4.d.

calendar day period for code request processing (i.e., NANPA processing, input to the Telcordia systems for the LERG update, input for the rating systems, such as the NECA 4 Tariff, etc.) and then a standard 45 calendar day activation interval. The activation of codes can begin anytime within this 45 calendar day interval to be completed and tested prior to the effective date. The effective date is the date that the new code holder can begin assigning individual telephone numbers to its end user customers.

Qwest's documentation for CLECs regarding numbering administration can be found at: <http://www.qwest.com/wholesale/pcat/phonenumbers.html>. Based on the industry's 45 calendar day activation interval, Qwest's internal process for the network translations work is to begin activation for the tandem switches at least 10 business days in advance of the LERG effective date and 5 business days in advance of the LERG effective date for all of the end office switches in the LATA. This provides sufficient time to complete the translations work and testing prior to the LERG effective date.³

The early activation of codes is an accepted industry practice so that all relevant carriers will have deployed the appropriate routing and activation of the code prior to the effective date. As stated above, the effective date is when the new code holder can expect that all relevant carriers have activated the appropriate rating and/or routing changes for the code and the new code holder may begin assignment of telephone numbers within the new code. This is also demonstrated by the Performance Indicator Definition ("PID") NP-1 developed by the ROC Technical Advisory Group to measure Qwest's implementation of NXX codes. Reply Exhibit MSB-3 is the PID NP-1 that measures Qwest's implementation of new NXX codes prior to the LERG effective date.

QUESTION:

Are there any internal procedures dictating that a Qwest request to assume the 406/294 NPA/NXX in advance of the July 13th LERG date be in writing? Which documents, if any, are exchanged or are relied upon in these procedures?

RESPONSE:

First, this was not a request by Qwest to assume the 406-294 NPA-NXX code. This was a request by NANPA to Qwest to assume responsibility for the NXX code. Qwest voluntarily agreed to assume responsibility for the NXX code because some customers with telephone numbers assigned in the 294 NXX code had previously ported to Qwest. Qwest could have declined to take the code and then, in accordance with the industry's guidelines, NANPA would either need to find another carrier that may have also ported in some numbers from the 294 NXX code or have gone to the Montana Commission to seek assistance for finding a carrier to assume responsibility for the code. Alternatively, if the NANPA can't find a willing carrier to take the code, it could post a Part 3 Disconnect notice which would require any carriers that had ported numbers from that NXX code to make their end user customers change their telephone numbers prior to the disconnect effective date.

In answer to the question, no there are no internal procedures dictating that Qwest make a request in writing [assuming this means writing to the original code holder or carrier disconnecting the code] to assume the code. There is written notice, in accordance with the industry's guidelines, that NANPA is required to send to both carriers – to the original or disconnecting code holder (i.e.,

³ As described in the initial ex parte response, for a returned/disconnecting code, it is assumed there are no working telephone numbers to be impacted.

Avista/OneEighty) and to the receiving carrier (i.e., Qwest). As stated in the original ex parte response: "In accordance with the industry guidelines, on May 22, 2002 NANPA issued a Central Office Code (NXX) Assignment Request – Part 3 that is sent to both the original code holder, Avista, and to the new code assignee, Qwest, with an effective date of July 13, 2002."⁴ That notification was attached to the initial ex parte response as Reply Exhibit MSB-2. It has not been Qwest's practice to duplicate NANPA's notification responsibilities.

In addition, in accordance with the industry Central Office Code Assignment Guidelines,⁵ Qwest issued the change to Telecordia's Business Integrated Routing and Rating Database System ("BIRRDs") which is the source data for the LERG. All carriers should receive the national LERG information for NXX codes.

QUESTION:

Does Qwest acknowledge being notified via voice mail by OneEighty on June 24, 2002 (after Qwest's request to assume the NPA/NXX earlier the same day) that 406/294 was a working OneEighty NPA/NXX? If OneEighty did notify Qwest by voice mail on June 24th that 406/294 was a working OneEighty NPA/NXX, what time of day was the notification received by the voice mail system? When was the notification received by the recipient?

RESPONSE:

See response to Question No. 1.

QUESTION:

Was Qwest notified, by means other than voice mail, by OneEighty that the 406/294 was a working OneEighty NPA/NXX?

RESPONSE:

No.

QUESTION:

By its Ex Parte response to the previous Checklist Item 11 questions, Qwest agrees that the causes of the June 25th and July 18th outages are "directly related." If on June 24th Qwest requested to assume 406/294 in advance of the LERG date and later the same day OneEighty indicated that 406/294 was a working NPA/NXX, what evidence as to the internal controls demonstrates that Qwest is not responsible for the disruption of service in June? And three weeks later in July?

⁴ NANPA's Code Return procedures, § 4.d.

⁵ The Central Office Code Assignment guidelines can be found by accessing the FCC's North American Numbering Council's website at <http://www.fcc.gov/wcb/tapd/Nanc/> and then the link to the NANPA website (or directly to the NANPA website at www.nanpa.com/).

RESPONSE:

Qwest was not requesting OneEighty's approval to turn up the code early. Qwest was placing a courtesy call to advise OneEighty that Qwest was beginning the activation of the new routing for the code that supposedly OneEighty had requested to be disconnected/returned to the NANPA. Contacting the disconnecting original code holder is not required by the industry's guidelines unless, as stated above, the new code holder will not complete its deployment prior to the effective date.⁶ Also included in the initial ex parte, was an explanation of the subsequent service problem and why the direction by NANPA to Qwest did not clearly indicate the responsibility for stopping the processing by NeuStar of the pending NPAC orders as shown in the Reply Exhibit MSB-1 to that ex parte. As Qwest stated previously, Qwest assumed the NANPA emergency notification to the industry would include notification to NeuStar's NPAC to cancel the pending orders that changed the Location Routing Numbers ("LRN").

OneEighty had ample opportunity to have taken action with the NANPA to prevent these service problems. OneEighty made its initial request to NANPA for the name change that NANPA unfortunately processed as a request to disconnect/return the code in November 2001. So, in six months time, OneEighty apparently never contacted the NANPA to find out why the name change had not been processed. Then, in May 2002, NANPA, according to the industry guidelines, would have sent OneEighty a copy of the Part 3 form to suspend its Avista/OneEighty's Part 1 form pending identification of a new Code holder.⁷ Then, NANPA would send another Part 3 form to OneEighty indicating that Qwest had volunteered to assume responsibility for the code.⁸ So, in May 2002, OneEighty would have received two Part 3 forms from the NANPA and apparently didn't contact NANPA to question first why the code was being processed as a returned/disconnecting code and then again with the second Part 3 form to question why the code was being reassigned to Qwest. Subsequent to receiving the Part 3 form, a new code holder, in this case Qwest, is required to enter the information into the BIRRDs system to update the LERG and issue orders to change the LRN in NeuStar's NPAC LNP database. OneEighty should have received the LERG information and could have taken action with the NANPA at that time to question why the code was being reassigned. So, in all, nearly seven months of time passed between OneEighty's request to the NANPA and then various forms of notification should have been received by OneEighty.

Qwest, nor the industry and the NANPA for that matter, has not had a great deal of experience with returned/disconnected NXX codes. Qwest has only had a total of five previous codes that it agreed to voluntarily assume responsibility for when asked by the NANPA. All of those, including this instance, have occurred since March 2002. Until this incident, Qwest has used its normal processes for activating a new code in its network. As described in the initial ex parte, Qwest has taken action with the NANPA by volunteering to work with the NANPA to propose improvements to the guidelines to more specifically address actions to be taken and the responsibilities of the various parties when problems are encountered with Returned/Disconnecting Codes.

⁶ See Response to Question No. 2.

⁷ NANPA's Code Return procedures, § 4.a.

⁸ NANPA's Code Return procedures, § 4.d.

QUESTION:

Despite the mistaken order processing by NeuStar, explain what actions, if any, Qwest took to prevent service disruption after it was notified by OneEighty that 406/294 was a working NPA/NXX?

RESPONSE:

As described previously, Qwest was directed by the NANPA in its June 25, 2002 letter⁹ to cancel the change of assignee in Telecordia's Business Integrated Routing and Rating Database System ("BIRRD") which is the source data for the LERG which Qwest did. Qwest restored the previous routing translations on the trunk groups from its tandems.

QUESTION:

Did Qwest check to see whether there were E911 entries, LIDB entries, or Directory Assistance listings needing to be changed from OneEighty to Qwest before rerouting the prefix to a disconnect recording?

RESPONSE:

It is assumed that the original code holder has contacted the NANPA to return a code or the NANPA has requested the return of an unused code based on its audit reports such that original code holder has no working telephone numbers in that code. The E911 database which is administered by a third party, Intrado, and the LIDB and Directory Assistance databases contain proprietary customer information and are not generally available for access. Therefore, the Qwest network organizations do not have access to these databases. If there are no telephone numbers being used by the original code holder, then there should be no entries in the E911, LIDB, or DA that need to be changed. Also, these databases do not contain all telephone numbers that are assigned to end user customers or used by carriers.

In addition, changes to these databases are not done by NXX code. Changes to these databases are performed by the service provider based on an individual end user customer's service orders (i.e., by individual telephone number not by NXX code). In addition, individual telephone numbers assigned in the specific NXX code may be in use by end user customers of other service providers (e.g., an end user customer with a 294-XXXX telephone number may have ported its telephone number to a service provider other than Qwest).

QUESTION:

According to OneEighty, Qwest asserted by letter on June 28, 2002 that it has canceled all associated orders for the 406 294 code change as well as orders for the code change associated with 406 384. All routing has returned to the original configuration. Did Qwest make such a representation by letter to OneEighty on June 28, 2002? Were the actions, as described in the June 28th letter, taken by Qwest? If such actions were taken, please describe them fully.

⁹ NANPA's June 25, 2002 letter to Qwest explaining its error in reassigning the 406-294 code to Qwest was attached to the initial ex parte response as Reply Exhibit MSB-1.

RESPONSE:

Yes, Qwest did advise OneEighty by letter on June 28, 2002 that Qwest had canceled all associated orders for the 406-294 and 406-384 codes. All internal Qwest routing orders associated with those codes were canceled and the previous trunk routing translations were restored. See Response to Question No. 8.

QUESTION:

If such actions were taken, explain how the July outage occurred in the wake of those actions?

RESPONSE:

As described in the initial ex parte response, NANPA's June 25, 2002 letter only directed Qwest to initiate a change to Telcordia's BIRRDs system to correct the LERG. The letter stated that the NANPA would send emergency notification to the industry to cancel the reassignment of the NXX code to Qwest. Qwest assumed NANPA's emergency notification to the industry would include notification to NeuStar's NPAC to cancel the pending orders in the NPAC's Western Region LNP database. That was not done, so July 18, 2002 the NPAC worked the pending orders that caused the second service problem. The industry's guidelines are not clear in this regard which is why Qwest volunteered to assist NANPA develop a contribution to the Industry Numbering Committee's ("INC") Central Office Code Assignment Working Group with additional clarification. Qwest believes the guidelines need to address the specific responsibilities of the NANPA and other parties, such as the new assignee of a returned code, in case there is a problem encountered (e.g., who sends the notification to the NPAC to cancel the associated LRN orders.)

ATTACHMENT

NP-1 – NXX Code Activation

Purpose: Evaluates the timeliness of Qwest's NXX code activation prior to the LERG effective date or by the "revised" effective date, as set forth herein.	
Description: NP-1A: Measures the percentage of NXX codes activated in the reporting period that are actually loaded and tested prior to the LERG effective date or the "revised" date, subject to exclusions shown below. NP-1B: Measures the percentage of NXX codes activated in the reporting period that are delayed beyond the LERG date or "revised" date due to Qwest-caused Interconnection facility delays, subject to exclusions shown below. Included among activations counted as a Qwest delay in this sub-measurement are cases in which "2-6 codes" ^{NOTE 1} associated with the Qwest interconnection facilities are provided late by Qwest to the CLEC. <ul style="list-style-type: none"> • QWEST must receive complete and accurate routing information required for code activation, which includes but is not limited to "2-6 codes" for all interconnection trunk groups associated with the activation no less than 25 days prior to the LERG Due Date or Revised Due Date. • The "revised" date, for purposes of this measurement, is a CLEC-initiated renegotiation of the activation effective date that is no less than 25 days after Qwest receives complete and accurate routing information required for code activation, which includes but is not limited to "2-6 codes" for all interconnection trunk groups associated with the activation. • The NXX code activation notice is provided by the LERG (Local Exchange Routing Guide) to Qwest. • NXX code activation is defined as complete when all translations associated with the new NXX are complete by 11:59 p.m. of the day prior to the date identified in the LERG or the "revised" date (if different than the LERG date). • The NXX code activation completion process includes test calls to the activated NXX, where the CLEC's provide a valid test number no less than 25 days prior to the LERG due date or the Revised due date. 	
Reporting Period: One month	Unit of Measure: Percent
Reporting Comparisons: CLEC aggregate, individual CLEC and Qwest Retail results.	Disaggregation Reporting: State level.
Formula: NP-1A = [(Number of NXX codes loaded and tested in the reporting period prior to the LERG effective date or the "revised" date) / (Number of NXX codes loaded and tested in the reporting period)] x 100 NP-1B = [(Number of NXX codes loaded and tested in the reporting period that were delayed past the LERG effective date or "revised" date affected by Qwest Interconnection Facility Delays) / (Number of NXX codes loaded and tested in the reporting period, including NXX codes loaded and tested in the reporting period that were delayed past the LERG effective date or the "revised" date due to Interconnection Facility Delays)] x 100	
Exclusions: NP-1A: <ul style="list-style-type: none"> • NXX code activations completed after the LERG date or "revised" date due to delays in the installation of QWEST provided interconnection facilities associated with the activations. NP-1A and NP-1B: <ul style="list-style-type: none"> • NXX codes with LERG dates or "revised" dates resulting in loading intervals shorter than industry standard (currently 45 calendar days). • NXX codes where QWEST received complete and accurate routing information required for code activations less than 25 days prior to the LERG due date or Revised due date. 	
Product Reporting: None	Standard: NP1-A – Parity

	NP1-B – Diagnostic
Availability: Available	Notes: 1. "2-6 codes" are industry-standard designators for local interconnection trunk groups, consisting of 2 alpha letters and six numeric digits.